



DEPARTMENT OF THE TREASURY  
INTERNAL REVENUE SERVICE  
WASHINGTON, D.C. 20224

TAX EXEMPT AND  
GOVERNMENT ENTITIES  
DIVISION

MAR 21 2008

T:EP:RA:TAZ

In re: Request to use substitute mortality table

Plan for which a substitute mortality table is requested ("Permissive Plan") =

Plan(s) for which substitute mortality tables are not requested ("Excluded Group")=

Dear

This letter is to inform you that your request to use a substitute mortality table for making computations under section 430 of the Code for the above Permissive Plan has been granted with respect to the population specified in this letter, effective for a period of up to 5 years beginning with the 2008 plan year. Your request has been granted in accordance with section 430(h)(3) of the Internal Revenue Code and section 303(h)(3) of the Employee Retirement Income Security Act of 1974 ("ERISA").

In granting this approval, we have considered only the development of the substitute mortality rates and whether they sufficiently reflect the mortality experience of the applicable plan population. Accordingly, we are not expressing any opinion as to the accuracy or acceptability of any calculations or other material submitted with your request.

Permission is hereby granted to use the substitute mortality rates shown in the table below:

**Non-disabled Male Annuitant Mortality Rates**

Age	q <sub>x</sub>	Age	q <sub>x</sub>	Age	q <sub>x</sub>
1	0.000588	41	0.001116	81	0.082003
2	0.000397	42	0.001260	82	0.090053
3	0.000329	43	0.001478	83	0.098476
4	0.000256	44	0.001768	84	0.107304
5	0.000235	45	0.002129	85	0.121344
6	0.000225	46	0.002560	86	0.135383
7	0.000216	47	0.003061	87	0.149423
8	0.000199	48	0.003922	88	0.163462
9	0.000193	49	0.004783	89	0.177501
10	0.000196	50	0.005645	90	0.191541
11	0.000202	51	0.006506	91	0.205580
12	0.000210	52	0.007367	92	0.219619
13	0.000221	53	0.008228	93	0.233659
14	0.000235	54	0.009089	94	0.247698
15	0.000249	55	0.009951	95	0.265357
16	0.000263	56	0.010812	96	0.281641
17	0.000279	57	0.011673	97	0.297460
18	0.000293	58	0.011881	98	0.314037
19	0.000307	59	0.012268	99	0.328888
20	0.000320	60	0.012753	100	0.343180
21	0.000332	61	0.013229	101	0.358628
22	0.000342	62	0.013626	102	0.371685
23	0.000351	63	0.013935	103	0.383040
24	0.000357	64	0.014233	104	0.392003
25	0.000361	65	0.014673	105	0.397886
26	0.000369	66	0.015401	106	0.400000
27	0.000374	67	0.016498	107	0.400000
28	0.000385	68	0.018008	108	0.400000
29	0.000404	69	0.019941	109	0.400000
30	0.000435	70	0.022298	110	0.400000
31	0.000489	71	0.025092	111	0.400000

Age	q <sub>x</sub>	Age	q <sub>x</sub>	Age	q <sub>x</sub>
32	0.000551	72	0.028345	112	0.400000
33	0.000618	73	0.032126	113	0.400000
34	0.000688	74	0.036490	114	0.400000
35	0.000758	75	0.041449	115	0.400000
36	0.000824	76	0.047006	116	0.400000
37	0.000886	77	0.053152	117	0.400000
38	0.000941	78	0.059816	118	0.400000
39	0.000993	79	0.066887	119	0.400000
40	0.001045	80	0.074291	120	1.000000

The above table will be used for the non-disabled male annuitant population in the Permissive Plan. The populations of the Permissive Plan for which the substitute mortality table will not be used (excluded populations) are non-annuitant male participants, all female participants and all disabled participants. Standard mortality tables issued by the IRS will be used for all populations of the Excluded Group and all excluded populations of the Permissive Plan.

The rates were developed based on an experience study period from January 1, 2003, through December 31, 2006, and were graduated using the Whittaker-Henderson Type B graduation method. The Service has reviewed the substitute mortality rates and supporting information, and has determined that based on the information submitted, the rates sufficiently reflect the mortality experience of the applicable plan population.

Your attention is called to section 430(h)(3)(C)(ii) of the Code, section 303(h)(3)(C)(ii) of ERISA, and section 1.430(h)(3)-2(d)(4) of the proposed regulations, which describe the circumstances in which the use of the substitute mortality table will terminate before the end of the 10-year period described above. In general, the substitute mortality tables can no longer be used as of the earliest of:

- (1) The plan year in which the plan fails to satisfy the requirements of paragraph 1.430(h)(3)-2(c)(1) of the proposed regulations, requiring that the groups for which substitute mortality tables is used must have credible mortality experience,
- (2) The plan year in which the plan fails to satisfy the requirements of paragraph 1.430(h)(3)-2(d)(1) of the proposed regulations, regarding the requirement that other plans and populations in the controlled group must use substitute mortality tables unless it can be demonstrated that they do not have credible mortality experience,
- (3) The second plan year following the plan year in which there is a significant change in individuals covered by the plan as described in paragraph 1.430(h)(3)-2(d)(4)(ii) of the proposed regulations (generally applicable when there is a change of 20% or more in the number of individuals in the population for which the substitute mortality table is used),

- (4) The plan year following the plan year in which a substitute mortality table used for a plan population is no longer accurately predictive of future mortality of that population, as determined by the Service or as certified by the enrolled actuary to the satisfaction of the Service, and
- (5) The date specified in guidance published in the Internal Revenue Bulletin regarding any replacement mortality tables specified under section 430(h)(3)(A) and 1.430(h)(3)-1, other than annual updates to the static mortality tables issued pursuant to 1.430(h)(3)-1(a)(3) of the proposed regulations.

This ruling is directed only to the taxpayer that requested it. Section 6110(k)(3) of the Code provides that it may not be used or cited by others as precedent.

When filing Form 5500 for the plan years for which the substitute mortality table is used, please note the information that is required to be attached to Schedule SB (Actuarial Information) in accordance with the instructions to that form.

We have sent a copy of this letter to the \_\_\_\_\_ and to your  
to the \_\_\_\_\_  
authorized representatives pursuant to a power of attorney on file in this office.

If you require further assistance in this matter, please contact  
at \_\_\_\_\_

Sincerely,



David M. Ziegler, Acting Manager  
Employee Plans Actuarial Group 2